REMARKS

Claims 1-38 were presented for examination and were pending in this application. In the above-referenced Office Action, claims 1-38 were rejected. The Examiner rejected claim 19 under 35 U.S.C. § 112, second paragraph, and rejected claims 1-38 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,812,131 to Betram (Betram) and U.S. Patent No. 6,593,944 to Nicholas et al. (Nicholas).

Applicants herein amend claim 18 as described below and amend claims 20-22 to change "method" to "system." Applicants request reconsideration and allowance of claims 1-38.

The Examiner rejected claim 19 under § 112, second paragraph. Applicants believe that the Examiner meant to reject claim 18, since claim 19 does not contain the term "nested tables" mentioned by the Examiner. Applicants have amended claim 18 to clarify the point raised by the Examiner. In practice, the nested table display heuristic module determines whether nested tables are present and deals with them if they are present. If no nested tables are present, the nested table display heuristic module takes no action.

The Examiner rejected claims 1-38 under § 103(a) as being unpatentable over Betram and Nicholas. Applicants disagree with this rejection.

Applicants' invention relates to a method and system for reformatting display data to fit on a smaller screen. Applicants' invention is specifically intended to operate on a display format where data can be organized in tabular format (such as HTML, which contains a <table> tag). Under certain circumstances, tabular data formatting is removed from the display data so that the data is no longer displayed as a table. An example of such removal and its result is shown in, for example, applicants' Figs. 8-10.

In contrast, Betram shows an example in which one wide table is broken into two tables for display (Figs. 9 and 10 of Betram). The tables are still displayed as tables, but the table size is changed. As an initial point, applicants disagree with the Examiner's contention that Betram discloses removing table formatting if a table contains more than one column exceeding a first predetermined width allowance. While Betram does discuss what to do if an entire table is too wide horizontally, Betram does not discuss what happens if an individual cell element is too wide horizontally, or if more that one cell element is too wide. The cell elements shown in the example of Figs. 9 and 10 of Betram do not exceed the width of the screen, so Betram does not even address what would happen if an individual "cell element" exceeds a predetermined width. [1] For this reason alone, Betram fails to disclose or suggest the invention of claims 1, 5, and 18, which recite at least this aspect of the invention. Claims 1, 5, and 18 and their dependent claims are patentable for at least this reason.

The Examiner admits that Betram completely fails to disclose treatment of nested tables. Nested tables are explicitly recited in independent claims 1 and 18 (and in dependent claims 10, 27, 28, 29, 31, and 32). The Examiner relies upon Nicholas to provide a teaching relating to nested tables. Nicholas, however, completely fails to mention or discuss tables of any kind, nested or otherwise. An electronic search of the specification of Nicholas fails to find even one occurrence of the words "table" or "nested." Nicholas is related to the idea of displaying web pages that are designed using the HTML "frames" feature. Applicants note that HTML frames are different from tables. In Nicholas, if a web page is found to have frames, the frames are displayed one by one, either in a predefined format or using a format determined by the software. No table formatting data is removed, since Nicholas does not discuss removing any kind of table

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[1] As an aside, Applicants disagree with the Examiner's contention that Betram, col. 3, line 65-col

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formatting data at all. Even if the Examiner's suggested combination could be made, and was made, the resulting combination would not result in applicants' claimed invention.

Applicants also disagree with the Examiner's contention that a person of ordinary skill in the art would have been motivated to combine Betram and Nicholas at the time the invention was made and that the resulting combination would have resulted in applicants' invention, assuming it could be made. The Examiner's stated reasoning involves displaying frames of a web page, which has nothing to do with applicants' claimed invention, and is therefore, unconvincing. Nicholas does not cure the deficiencies of Betram and claims 1 and 18, and their dependent claims are allowable for at least this reason.

Independent claims 13, 17, and 23 are patentable for a similar reason to that discussed above in connection with claims 1 and 18. The Examiner admits that Betram does not anticipate these claims and relies upon alleged teachings in Nicholas for a disclosure of removing tabular formatting data. Nicholas, however, as discussed above, contains absolutely no discussion of tables or of removing tabular formatting data. Therefore, Nicholas does not cure the deficiencies of Betram and claims 13, 17, 23, and their dependent claims are allowable for at least this reason.

Applicants have not addressed the Examiner's various contentions concerning each dependent claim herein. Applicants have noted several inaccurate characterizations in the Office Action concerning the teachings of Betram and Nicholas as they relate to dependent claims. Applicants reserve the right to contest these inaccuracies in the future if necessary.

4, line 2 discusses empty tables.
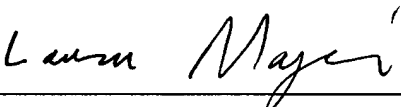
Conclusion

Applicants respectfully submit that claims 1-38, as presented herein, patentably distinguish over the cited reference (including references cited, but not applied). Applicants respectfully request reconsideration and allowance of these claims.

In addition, Applicants respectfully invite the Examiner to contact Applicants' representative at the number provided below if the Examiner believes it will help expedite furtherance of this application.

RESPECTFULLY SUBMITTED,

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